

REMARKS

In the Official Action mailed on **05 June 2006**, the Examiner reviewed claims 1-35. Claims 1-35 were rejected under 35 U.S.C. §102(b) as being clearly anticipated by Cobb (WO 00/67074 A1, hereinafter “Cobb”).

Rejections under 35 U.S.C. §102(b)

Claims 1-35 were rejected as being clearly anticipated by Cobb. Applicant respectfully points out that the present invention determines if the target cell is similar to a preceding cell for which there exists a previously calculated solution. If this is so, then the previously calculated solution is used as a **starting point for the correction process** (see FIG. 7 and page 12, lines 20-22 of the instant application). This is beneficial because it provides a starting point to the correction process for target cells that are similar but not necessarily equivalent to the preceding cell, thereby reducing the computation time for the correction process.

In contrast, Cobb teaches determining “if two areas are equivalent for OPC purposes.” If they are determined to be equivalent, then the analyzer “causes the earlier determined corrections to be re-used on the area, to avoid repeating the costly re-computations.” If the areas are not determined to be equivalent, then “model-based analyses” are performed by the simulator “for each unique area, ... to determine the appropriate corrections for each area” (see paragraph 1, page 5 of Cobb). Applicant respectfully submits that **there is no mention of re-using the earlier determined corrections, either as a starting point in the simulation or as used in the model-based analyses, in the case when the areas are not determined to be equivalent.** In addition, Applicant submits that the text in page 8, paragraph 2 describes the iterative process performed by the simulator to determine the corrections in the case that an area is non-equivalent to a previously corrected area; there is no mention here of using a pre-determined correction as a

starting point for the iterative process. Therefore, Applicant respectfully requests the examiner to please point out the specific text in Cobb that demonstrate re-use in the case when equivalence is not established.


Applicant has amended claims 1, 11, 21, 31, and 32, and respectfully submits that the currently amended claims carry patentable weight. These amendments find support in page 11, lines 6-9 of the instant application

Applicant respectfully submits that independent claims 1, 11, 21, and 31-32 as presently amended are in condition for allowance. Applicant also submits that claims 2-10, which depend upon claim 1, claims 12-20, which depend upon claim 11, claims 22-30, which depend upon claim 21, and claims 34-35, which depend upon claim 33, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

CONCLUSION

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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